

INTERMEDIARY PRIVACY NOTICE



Information about us

Vida Bank Limited trading as Vida Homeloans (“Vida Homeloans”, “we” or “us”) is a data controller and gathers and uses information about you as a mortgage intermediary. Details of our notification to the regulator for data protection, may be found in the Information Commissioner’s Office Public Register of Data Controllers at www.ico.org.uk under registration number ZA161427.

The www.vidahomeloans.co.uk website and its webpages (the “Site”) are also operated by Vida Bank Limited, whose registered office is at 1 Battle Bridge Lane, London, SE1 2HP.

If you require any further information, please contact our Data Protection Officer:

The Data Protection Officer
Vida Bank Limited
1 Battle Bridge Lane
London
SE1 2HP

Email: dataprotectionoffice@vidabank.co.uk

Phone: 03300 246 246

Key summary

The purpose of the Privacy Notice (“the Notice”) is to set out the purposes for which, and the manner in which, we may collect and use personal information that we may obtain about you. We collect data about you when you register as a user of any services provided by us on our Site and/or by using this Site generally you consent and agree to this use by us.

The UK General Data Protection Regulation (UK GDPR) requires Vida Homeloans to manage personal information in accordance with the GDPR Principles. In particular, Vida Homeloans is required to process your personal information fairly and lawfully. This means that you are entitled to know how we intend to use any information you provide. You can then decide whether you want to give it to us in order that we may register you as a mortgage intermediary.

All our employees are personally responsible for maintaining customer confidentiality. We provide training to all employees to remind them about their obligations. In addition, our policies and procedures are regularly audited and reviewed.

Who this Notice covers

This Notice explains how we will use the personal data of:

- Individuals who are professional advisers and persons representing individuals who apply for or take out a loan with us;
- Other professional advisers/intermediaries dealing with Vida Bank Limited or Vida Homeloans and any potential intermediaries.

Fair processing notice

When you register as a user of our services, we will check records about you and your business partners.

We will check the following types of records:

- Our own records and those of Vida Bank Limited group companies
- Those at fraud prevention agencies (FPAs).
- Publicly available records including those held by Companies House and regulatory bodies such as the Financial Conduct Authority (FCA) and Information Commissioner’s Office (ICO).

If you give us false or inaccurate information and we suspect or identify fraud we will record this and may also pass regulatory bodies or law enforcement.

We and other organisations may access and use from other countries the information recorded by fraud prevention agencies. From time to time, service providers and organisations with whom we work to provide services to you or the fraud prevention agencies with which we work, may be located outside the UK or European Economic Area in countries that do not have the same standards of protection for personal data as the UK. We will, however, always use every reasonable effort to ensure sufficient protections are in place to safeguard your personal data.

We may use your information and/or personal data for the purposes of conducting market research and statistical analysis, estimating product sales, for purposes of preventing fraud and money laundering. For certain purposes, we may share your information with third parties, such as service providers or governmental bodies. This may include, but is not limited to, meeting our contractual reporting obligations.

Your information and/or personal data may also be used for other purposes for which you give your specific permission or, in very limited circumstances, when required by law or where permitted under the terms of the Data Protection Act 2018.

Vida Homeloans is a trading style of Vida Bank Limited. Your information and/or personal data will be shared therefore with other companies in the Vida Bank Limited group, both now and in the future as we develop business.

The type of personal information we collect:

Where necessary this may include data about:

- Information relating to you as an individual including:
- your name, title and address (including previous names and addresses)
- other contact details including email address and telephone number
- your gender, date of birth

Information about your employment status including:

- your employer(s)
- your role
- directorships and shareholdings you may hold

Information about how you access the site:

- your device identifiers including IP address
- Information from any other checks we are required by regulations to carry out:
- any criminal convictions
- whether you are a Politically Exposed Person and/or subject to financial sanctions.

Special category data

Special category data is personal information that requires more protection due to its sensitive nature for example about your health, racial or ethnic origin. We will only collect this information if required by law or where we have your consent.

Any special category data will only be processed where it is necessary and only with your prior explicit consent; where permitted by law to protect your well-being, or for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.

Criminal convictions

Any personal data on criminal convictions will only be processed as follows:

- to prevent fraud or to comply with our legal obligations under anti Money Laundering and Financial Sanctions Legislation.

What is the legal basis for our use of your information

Where we use your personal data, we must have a legal basis that justifies our use of your information. There are a number of legal bases under which we process your data:

Contract

- for the performance of a contract with you or, if you asked us to, to enable us to enter into a contract with you, to fulfil our contractual obligations to you or because you have asked us to do something before entering into a contract.

Legal obligation

- to comply with our legal obligations, including common law or statutory obligations.

Consent

- if you have consented to us processing personal data for one or more specified purposes.

Legitimate Interests

This means the purpose is essential or relevant to our business. The legitimate interests we have for processing your personal data include to:

- comply with our legal and contractual obligations, best practice and codes of practice
- exercise our legal rights
- prevent financial and other crime
- meet your expectations of us
- enhance and develop the products and services we provide to you
- develop and improve our business, products and services and the terms which apply to them
- undertake analysis, modelling and forecasting
- manage and mitigate the risks to you and our business
- keep our records up to date and to enable us to link your different accounts with us together
- ensure that persons that are affected if the terms of the loan are not met are provided with information about the loan with us which is appropriate to their circumstances. This will include parties to the loan, guarantors, persons with an interest or claiming an interest in the property which is security for the loan such as occupiers and other lenders with a charge secured on the property
- ensure we have sufficient information to consider any request for a decision in principle/application or to administer the loan
- verify the information provided to us to ensure its accuracy
- be efficient in running our business, providing our products and services, fulfilling our legal obligations
- contact existing customers about other products and services we offer
- ensure our business is profitable and has adequate levels of capital and funding, or facilitate investment in, and the growth of, our business.

How we receive personal data

Vida Homeloans collects personal data about you from a variety of sources including:

- from you directly
- your employer
- FRAs
- solicitors, valuers, and other individuals working on our behalf
- market researchers
- local and national government, tax and law enforcement agencies
- publicly available information such as from the Electoral Register, Companies House, the Land Registry and internet searches.

How do we share your personal information

We may give information about you to the following companies and organisations who may use it for the same purposes as set out above:

- to our employees and agents or other approved third parties to administer any accounts or provide services to you on our behalf
- to approved third parties who provide services to you upon our request, including sending communications to you on our behalf
- other representatives and advisers including solicitors and accountants
- companies which you as a mortgage intermediary are associated for example because they are responsible for your compliance with legal obligations or you have chosen to submit your client's application through or in connection with them

- parties to the loan, any guarantor of the loan, the company secretary, directors and shareholders of any company that is party to the loan
- any other person you or your client ask us to provide information to
- to anyone to whom we transfer our rights and duties under our agreement with you
- your employer
- your and our insurers
- our bank, BACS and the Direct Debit Scheme
- any occupier of the property and other persons who have or may have an interest in any property which is or is intended as security for a loan
- the freehold owner or management company of any leasehold property that is security for the loan, their representatives and advisers
- our advisers including valuers, solicitors, accountants and auditors including where necessary to protect or defend our legal rights or the legal rights of another company or person
- Law of Property Act receivers
- central and local government
- the Financial Ombudsman Service, courts and any arbitrator or adjudicator of a dispute involving us
- statutory and regulatory bodies including tax authorities, HMRC, Benefits Agency, Information Commissioner's Office, Prudential Regulation Authority, Financial Conduct Authority, Bank of England and other relevant international regulators
- FRAs
- law enforcement agencies
- market research companies
- any investor, potential investor, funder, purchaser in or of our business or any part of our business and their advisers
- organisations involved in any corporate finance transaction which we undertake or intend to undertake including, but not limited to, underwriters, loan servicers, trust managers and security trustees
- a potential purchaser if our business or any part of it is sold
- any business with which we are seeking to merge and their advisers
- any previous lender, or agents and suppliers who act or may act on our behalf
- to anyone we have a legal or regulatory duty to do so or if the law allows us to do so.

How we use your information

We use your personal information in the ways listed below.

To process the Mortgage Business that you submit to us or are submitted to us on your behalf and to administer any loans we subsequently make.

To manage our relationship with you, to administer and provide the loan and other products and services you have with us including to:

- check your identity
- contact you about your client's loan
- to respond to queries
- consider requests you and other persons make of us to decide whether we will agree to the request being made or provide the information requested
- create records, produce correspondence and other documents and provide information to you and other persons
- correct inaccurate data held by us and third parties
- update, consolidate and improve the accuracy of our records
- monitor and analyse the performance of your registration with us
- tell you about products and services offered by us which we think may be of interest to you.

To make sure we and third parties that act on our behalf have the information we need to consider your application or decision in principle and to administer the account including:

- obtaining additional information about you that is publicly available or by making enquiries, searches, requesting references and other information that we consider necessary, including to confirm the truth and accuracy of your personal data
- contacting, obtaining or providing information about you from or to debt management companies, trustees in bankruptcy, supervisors of individual voluntary arrangements and personal representatives.

To identify and prevent financial crime including:

- detecting, preventing, investigating and/or reporting suspected money laundering, fraud, bribery, corruption and other crime.

To comply with our legal, contractual and regulatory obligations as well as codes of conduct and to run our business including:

- providing data, reports and returns to our regulators, other statutory bodies, our trade bodies or when required by a court order or other legal or contractual obligation
- managing, monitoring, analysing, developing, forecasting and reporting on the performance of our businesses, suppliers and other third parties including accounting and auditing
- managing how we lend and use our resources
- managing risk for us and our customers
- seeking advice from our advisers
- complying with any other legal obligation imposed on us, including where you have sought to exercise your legal rights.

To develop and improve our products and services including:

- testing products and services
- obtaining your feedback on the products and services we provide
- undertaking market research
- ensuring that we meet high standards of customer service, including monitoring calls and training staff
- for profiling purposes to help us ensure that we provide you with the right information and offer you relevant services.

To undertake analysis, produce models, statistics, reports and forecasts including:

- predicting your economic situation and/or future behaviour.

To investigate and respond to complaints, disputes and where necessary to bring and defend legal claims including:

- identifying and documenting facts and evidence
- investigating and responding to complaints, disputes, regulatory investigations and/or to bring or defend legal claims
- allowing us to ensure that we offer the highest standard of customer service, by identifying if we have provided any inadequate service and the causes of such failings, and to determine how to avoid any repeat of that situation and improving our services.

Checks that we carry out and use of your personal information by fraud prevention agencies

Before we register you as a mortgage intermediary we undertake checks for the purposes of preventing fraud and money laundering, and to verify your identity. These checks require us to process personal data about you.

The personal data you have provided, we have collected from you, or we have received from third parties may include your:

- name
- contact details such as email address and telephone numbers
- employment details
- identifiers assigned to your computer or other internet connected device including your Internet Protocol (IP) address.

When we and fraud prevention agencies process your personal data, we do so on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect our business and to comply with laws that apply to us.

We, and fraud prevention agencies, may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

If you give us false or inaccurate information and we suspect or identify fraud we will record this and may also pass this information to fraud prevention agencies and other organisations involved in crime and fraud prevention.

We and other organisations may access and use from other countries the information recorded by fraud prevention agencies.

Consequences of processing

If we, or a fraud prevention agencies, determine that you pose a fraud or money laundering risk, we may refuse to register you as a mort- gage intermediary or we may stop providing existing services to you.

A record of any fraud or money laundering risk will be retained by the FPAs, and may result in others refusing to provide services, financing or employment to you. If you have any questions about this, please contact us.

Data transfers

Whenever fraud prevention agencies your personal data outside of the UK or European Economic Area, they impose contractual obli- gations on the recipients of that data to protect your personal data to the standard required in the UK or European Economic Area. They may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing.

Where we store your data and for how long

All information you provide to us is stored on secure servers. We are required to keep your data while you are reg- istered with us and for a further period of 6 years after the records are closed. This is subject to our obligations to comply with the record retention requirements under the Data Protection legislation. We may retain the data for longer where it is necessary for us to do so to meet our legal or regulatory obligations, for research or statistical purposes or technical reasons.

Where you have agreed to receive our marketing communications, we will keep your contact information on an on-going basis whilst we are actively communicating with you or until you ask us to stop sending you marketing communications.

Your data protection rights

You have a number of rights in relation to your information:

1. The right to be informed

You have the right to be informed about the collection and use of your personal data. You must be provided with information including: the purposes for processing your personal data, the retention periods for that personal data, and who it will be shared with. This information is provided within this Notice.

2. The right of access

You have the right to access your personal data. The right of access allows you to be aware of and verify the lawfulness of the processing. You have the right to obtain confirmation that your data is being processed and access to your personal data.

3. The right to rectification

The UK GDPR includes a right for individuals to have inaccurate personal data rectified or completed if it is incomplete. You can make a request for rectification verbally or in writing.

4. The right to erasure

The UK GDPR introduces a right for individuals to have personal data erased. You can make a request for erasure verbally or in writing. The right is not absolute and only applies in certain circumstances.

The right to erasure does not apply if processing is necessary for one of the following reasons:

- to exercise the right of freedom of expression and information
- to comply with a legal obligation
- for the performance of a task carried out in the public interest or in the exercise of official authority
- for archiving purposes in the public interest, scientific research historical research or statistical purposes where erasure is likely to render impossible or seriously impair the achievement of that processing
- for the establishment, exercise or defence of legal claims.

5. The right to restrict processing

You have the right to request the restriction or suppression of their personal data. This is not an absolute right and only applies in certain circumstances. When processing is restricted, we are permitted to store the personal data, but not use it. You can make a request for restriction verbally or in writing.

6. The right to object

You have the right to object to:

- processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling)
- direct marketing (including profiling)
- processing for purposes of scientific/historical research and statistics

For more information, or to exercise your data protection rights, or if you are unhappy about how your personal data has been used, please contact our Data Protection Officer.

Sending you personal data outside the United Kingdom and the EEA

Your personal data may be processed or transferred outside the United Kingdom and the European Economic Area.

If you require further information as to where your personal data is transferred to, and the measures we have implemented to safeguard that information, please contact our Data Protection Officer.

Access to information

Each time you visit our site we may automatically collect the following information:

- technical information, including the internet protocol (IP) address the request came from or the one your Internet service provider assigned to you, browser type and version, device type, operating system and version and your user locale (your default preferences for dates, times, numbers etc)
- the URL where you were referred from and any phone number used to call our customer service number.

When you register as an introducer of mortgage business to Vida Homeloans and/or use this Site:

- You may be asked to provide certain information such as your contact details and bank account details. We will store this data and hold it on secure servers.
- In addition, we may gather other information about your use of the Site, including by the use of cookies.

Cookies

Our website uses cookies. For detailed information on all the cookies we use and the purposes for which we use them please see our [Cookie policy](#).

Disclosure of your information

We will treat your personal information as private and confidential, but may share it with other companies in the Vida Bank Limited group and disclose it outside of Vida Bank Limited if:

- a) allowed by this agreement;
- b) you consent;
- c) needed by our agents, advisers or others involved in running accounts and services for you or collecting what you owe group companies;
- d) needed by subcontractors to help us manage your records;
- e) HM Revenue & Customs or other authorities require it;
- f) the law, regulatory bodies (including for research purposes), or the public interest permits or requires it;
- g) required by us or others to investigate or prevent crime;
- h) needed by market research companies to assist us in providing better products and services for you;
- i) needed by to any other parties connected with your account (including guarantors); or
- j) required as part of our duty to protect your accounts, for example we are required to disclose your information to the UK Financial Services Compensation Scheme (FSCS).

Marketing

We will ask for your consent before we use your data for marketing purposes. If you consent to receive marketing material you will be able to choose the ways by which you can be contacted and can exercise the right to opt out at any time.

Our Site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Please note that information may be shared with third parties for account administration and to meet Vida Home-loans' contractual reporting obligations.

Information we collect about you

If for any reason you are unsure about the personal information we are holding in your name, please contact us. We will happily review and update the records if required. You have the right to ask us to correct incorrect data which we may hold about you. You also have the right upon applying in writing to obtain a copy of the information held by us about you.

For more information or to exercise your data protection rights or if you are unhappy about how your personal data has been used, please contact our Data Protection Officer.

How to complain

If you have any complaints about the way we use your personal information please contact our Data Protection Officer:

The Data Protection Officer
Vida Bank Limited
1 Battle Bridge Lane
London
SE1 2HP

Email: dataprotectionoffice@vidabank.co.uk

Phone: 03300 246 246

If we cannot resolve any issue, you have the right to complain to the Information Commissioner:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

Useful links

Vida Cookies Policy

Please note that you can contact credit reference agencies for any data you believe to be incorrect and/or to log a notice of correction. For more information about how Credit Reference Agencies operate and how they use your information is available at:

Experian: <https://www.experian.co.uk/privacy>

TransUnion: transunion.co.uk/legal/privacy-centre

Equifax: https://www.equifax.co.uk/About-us/Privacy_policy.html

ICO website: [ico.org.uk](https://www.ico.org.uk)

ICO guidance for back up retention: <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/individual-rights/right-to-erasure/>

National Hunter

National Hunter, PO Box 4744, Stone, ST159FE
[nhunter.co.uk](https://www.nhunter.co.uk)

Credit Industry Fraud Avoidance System: <https://www.cifas.org.uk/fpn>

Vida Homeloans is a trading name of Vida Bank Limited, registered in England and Wales with company number 09837692 with its registered office at 1 Battle Bridge Lane, London, SE1 2HP. Vida Bank Limited is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority with Financial Services Register Firm Reference Number 738741.



03300 246 246



www.vidahomeloans.co.uk